

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO, S. DE R.L.  
DE C.V., *et al.*

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 18-11094 (SCC)  
(Jointly Administered)

FERNANDO PEREZ-CORREA IN HIS  
CAPACITY AS FOREIGN  
REPRESENTATIVE OF PERFORADORA  
ORO NEGRO, S. DE R.L. DE C.V.; JOSE  
ANTONIO CAÑEDO-WHITE; CARLOS  
WILLIAMSON-NASI; GONZALO GIL-  
WHITE; AND MIGUEL ANGEL  
VILLEGAS-VARGAS

Adv. Pro. No. 19-01360

Plaintiffs,

-against-

ASIA RESEARCH AND CAPITAL  
MANAGEMENT LTD.; GHL  
INVESTMENTS (EUROPE) LTD.; ORO  
NEGRO PRIMUS PTE., LTD.; ORO  
NEGRO LAURUS PTE., LTD.; ORO  
NEGRO FORTIUS PTE., LTD.; ORO  
NEGRO DECUS PTE., LTD.; ORO NEGRO  
IMPETUS PTE., LTD.; SHIP FINANCE  
INTERNATIONAL LTD.; and DOES 1-100

Defendants.

**STIPULATED SERVICE AND SCHEDULING ORDER**

**WHEREAS** the Plaintiffs, Fernando Perez-Correa, in his capacity as Foreign Representative of both Integradora de Servicios Petroleros Oro Negro, S.A.P.I. de C.V. and Perforadora Oro Negro, S. de R.L. de C.V., Jose Antonio Cañedo-White, Carlos Williamson-Nasi,

Gonzalo Gil-White and Miguel Angel Villegas-Vargas (together, the “Plaintiffs”), filed the above-captioned lawsuit on September 26, 2019; and

**WHEREAS**, on September 30, 2019 and October 1, 2019, the Defendants in this matter agreed to accept service of the Complaint [ECF 1] subject to the reservation of rights contained herein; and

**WHEREAS**, on October 1, 2019 the Defendants and the Plaintiffs agreed to a schedule for the filing of responsive pleadings in this matter.

Based on the foregoing, it is hereby **STIPULATED, AGREED AND ORDERED AS FOLLOWS:**

1. The Defendants have been served with the Complaint and Summons as of October 1, 2019. The Defendants preserve all defenses or objections to the lawsuit, the Court’s jurisdiction, and the venue of the action, and waive only objections to service.
2. The Defendants shall answer or otherwise move to dismiss the Complaint by October 31, 2019.
3. The Plaintiffs shall file responses to any motions to dismiss the Complaint by December 2, 2019.
4. The Defendants shall file any replies in support of any motions to dismiss the Complaint by December 17, 2019.
5. The Defendants do not consent or submit to this Court’s jurisdiction over them and such Defendants’ rights and defenses are explicitly reserved.

*[signature pages follow]*

Dated: October 11, 2019  
New York, New York

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/s/ Gabriel F. Soledad

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*Attorneys for the Plaintiffs*

Dated: October 11, 2019  
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Dated: October 11, 2019  
New York, New York

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By: /s/ Allan S. Brilliant

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Negro Decus Pte. Ltd.; and Oro Negro Impetus Pte.  
Ltd.*

ENTERED this 11th day of October, 2019.

SO ORDERED

/S/ Shelley C. Chapman

THE HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE